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February 1, 2013

Ms. Sandi Potter, Water Resources Control Engineer  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, California 94612  
VIA EMAIL: [SMPOTTER@WATERBOARDS.CA.GOV](mailto:SMPOTTER@WATERBOARDS.CA.GOV)

Dear Ms. Potter:

Thank you for the opportunity to comment on the proposed Conditional Waiver of Waste Discharge Requirements for Eligible Vineyard Properties in the Napa River and Sonoma Creek Watersheds ("Conditional Waiver").

I want to commend San Francisco Bay Regional Water Board staff for working with California Sustainable Winegrowing Alliance (CSWA) and other relevant stakeholders to review our Code of Sustainable Winegrowing Practices workbook. As a result, CSWA enhanced elements of the workbook to make it more applicable to the very same issues addressed in the proposed Conditional Waiver. A third edition of the Code was released in January 2013.

The proposed Conditional Waiver suggests the use of third party programs. We believe it is essential for farmers to have a variety of options to accommodate the various farming approaches and to ensure that those affected by the Waiver will have sufficient resources to comply. Given the broad adoption of the Code and related certification, CSWA urges the San Francisco Bay Regional Water Quality Control Board to include the California Code of Sustainable Winegrowing and Certified California Sustainable Winegrowing in the list of third party options for growers. CSWA has been working with water board staff to clarify the relationship between the Code criteria and draft waiver requirements, and we are interested in partnering with third party technical providers to ensure all requirements for third party groups, under the scope of the Conditional Waiver, are met.

Formally recognizing these programs will not only help the Board meet the stated goals of the Conditional Waiver program, but will also provide those growers who voluntarily participate in our program the added benefit of optional compliance, where feasible, with the Conditional Waiver program. Optional compliance opportunities can promote the adoption of practices that have positive environmental and social outcomes.

I want to underscore, that our comments regarding third party programs is not intended to undermine or diminish the reasoned concerns expressed by other Napa County



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winegrower organizations regarding the proposed Conditional Waiver. In addition, I want to emphasize that in offering CSWA as part of a third party program, we are not intending to require growers to participate in our voluntary program, but only offering it as an option should the board adopt the draft waiver.

The CSWA is a 501(c)(3) nonprofit organization incorporated in 2003 by Wine Institute and the California Association of Winegrape Growers (CAWG) to help winegrape growers and vintners track and continue to improve on the adoption of low impact, sustainable methods. CSWA's Code of Sustainable Winegrowing Practices workbook is a comprehensive assessment tool for growers and vintners that covers 138 vineyard and 103 winery sustainable winegrowing practices, many of which address objectives and practices included in the proposed Conditional Waiver. Since 2002, 1,800 vineyard and winery organizations, representing 72% of California's winegrape acreage and 74% of case production have used the Code to self-assess their operations.

Introduced in 2010, Certified California Sustainable Winegrowing (CCSW-Certified) grew out of the Code and provides third-party verification of a winery or vineyard's adoption of sustainable practices and implementation of continuous improvement. After evaluating their operations using the Code and meeting 50 vineyard and/or 32 winery prerequisite criteria, companies use self-assessment data and other considerations to determine what areas need to be improved, focus their resources on practices that will make the most difference for their sustainability goals, and continually improve year after year to retain certification. A third-party auditor verifies accuracy of scores and completion of all certification requirements. Because the self-assessment data is stored in a web-based system, there is also the built-in capacity to adapt the certification program for various needs and reporting requirements as needed. To date, 178 vineyards (12.3% of statewide acreage) and 56 winery facilities are Certified California Sustainable Winegrowing.

Thank you for your consideration.

Sincerely,

Allison Jordan  
Executive Director